

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLTAND DIVISION**

**UNITED STATES OF AMERICA**

**3:22-cr-00084-SI**

**v.**

**AMENDED PROTECTIVE ORDER**

**TONY DANIEL KLEIN,**

**Defendant.**

Upon unopposed motion of the Defendant, this Court being advised as to the nature of this case, it is hereby:

ORDERED that pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, counsel for defendant shall not provide defendant with copies of any discovery material produced by the government which contain:

- (a) Personal Information: personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, or professional license number;
- (b) Financial Information: financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, tax return information, or taxpayer identification numbers,

unless defense counsel first redacts the Personal Information or Financial Information from the discovery materials or if the Personal Information or Financial Information is the defendant's own information.

IT IS FURTHER ORDERED that defendant is allowed to view the unredacted discovery under the active supervision of defense counsel—that is, the unredacted discovery will be under the custody and control of defense counsel during defendant's review.

IT IS FURTHER ORDERED that neither defense counsel nor defendant shall provide any discovery material produced by the government, whether the material is redacted, to any person not a party to this case without the government's express written permission, except that defense counsel may provide discovery material, whether it is redacted, to members of the defense team and to those persons who are necessary to assist counsel in preparation for trial or other proceedings.

IT IS FURTHER ORDERED that while defendant is allowed to view discovery containing personal information regarding family members' names, or medical information, including mental health or substance abuse information, defendant shall not print or make copies, digital or otherwise, of such information.

IT IS FURTHER ORDERED that defendant shall not contact any known family members of any complaining witnesses referenced in the indictment or identified by the United States Attorney's Office.

Dated: August 9, 2022



HONORABLE MICHAEL H. SIMON  
United States District Judge